

November 17, 2022

The Honorable J. Mark Coulson
United States Magistrate Judge
101 West Lombard Street
Chambers 8D
Baltimore, MD 21201

Re: *Gov't Employees Health Ass'n v. Actelion Pharms. Ltd. et al.*, No. 18-cv-3560-GLR

Dear Magistrate Judge Coulson:

We submit this joint letter on behalf of the parties to the above-captioned case. As set forth in Plaintiff's November 3, 2022 Status Report (Dkt. No. 189 at 2), Plaintiff intends to move for spoliation-related sanctions in connection with certain of Defendants' actions during the pendency of this case. Defendants intend to oppose the motion and relief sought. The parties have agreed upon a schedule for briefing to be submitted to Your Honor, which we respectfully request that the Court "So Order."

Motion:	November 21, 2022
Opposition:	December 15, 2022
Reply:	December 29, 2022

Defendants reserve the right to seek leave to file a timely sur-reply. Plaintiff reserves the right to oppose such an application.

We appreciate the Court's continued attention to this matter.

Sincerely,

/s/ Sharon K. Robertson
Sharon K. Robertson

Co-Lead Counsel for Plaintiff
and the Proposed Class

/s/ George G. Gordon
George G. Gordon

Counsel for Defendants

Date:

UNITED STATES MAGISTRATE JUDGE